

The Honorable Brian A. Tsuchida

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,)	CASE NO. MJ19-444
)	
Plaintiff,)	COMPLAINT for VIOLATION:
)	18 U.S.C. § 2252(a)(4)(B), (b)(2)
v.)	
)	
WILLIAM LEROY LENZ,)	
)	
Defendant.)	
_____)	

BEFORE, The Honorable Brian A. Tsuchida, United States Chief Magistrate Judge,
United States Courthouse, Seattle, Washington.

COUNT 1

(Possession of Child Pornography)

Beginning on a date unknown but continuing until not later than in or about
September 21, 2019, at SeaTac, within the Western District of Washington, and
elsewhere, the defendant, WILLIAM LEROY LENZ, did knowingly possess matter that
contained visual depictions, the production of which involved the use of minors engaging
in sexually explicit conduct and the visual depictions were of such conduct, that had been
mailed and shipped and transported in and affecting interstate and foreign commerce by
any means, including by cellular phone, and which had been produced using materials

1 that had been mailed and shipped and transported in and affecting interstate and foreign
2 commerce by any means, including by cellular phone, and the depictions of child
3 pornography involved include images of a male infant being raped by a mature male.

4 All in violation of Title 18, United States Code, Section 2252(a)(4)(B), (b)(2).

5 I, Steven Munson, being first duly sworn on oath, depose and say:

6 **INTRODUCTION**

7 1. I am a Special Agent (SA) with the U.S. Department of Homeland Security
8 (DHS), Immigration and Customs Enforcement (ICE), Homeland Security Investigations
9 (HSI), assigned to the Special Agent in Charge (SAC), Seattle, Washington. I have been
10 employed as an HSI agent since May 2002. HSI is responsible for enforcing customs and
11 immigration laws, and federal criminal statutes of the United States. As part of my
12 duties, I investigate criminal violations relating to child exploitation and child
13 pornography, including violations pertaining to the illegal production, distribution,
14 receipt, and possession of child pornography and material involving the sexual
15 exploitation of minors in violation of 18 U.S.C. §§ 2251, 2252, and 2252A.

16 2. I am a graduate of the Federal Law Enforcement Training Center (FLETC),
17 the ICE Special Agent Training Program, and have received further specialized training
18 in investigating child pornography and child exploitation crimes. I have also had the
19 opportunity to observe and review examples of child pornography (as defined in 18
20 U.S.C. § 2256(8)). I have participated in the execution of previous search warrants,
21 which involved child exploitation and/or child pornography offenses, and the search and
22 seizure of cellular phones, computers, related peripherals, and computer media
23 equipment. I have worked with other federal, state, and local law enforcement personnel
24 in the investigation and prosecution of crimes involving the sexual exploitation of
25 children.

26 3. As further detailed below and based on my investigation and the
27 investigation of other law enforcement officers, I believe there is probable cause to
28 conclude that WILLIAM LEROY LENZ has committed the offense charged in Count 1

1 of this Complaint—namely, Possession of Child Pornography in violation of 18 U.S.C.
2 § 2252(a)(4)(B).

3 4. The facts set forth in this Complaint are based on my own personal
4 knowledge; knowledge obtained from other individuals during my participation in this
5 investigation, including other law enforcement officers; review of documents and records
6 related to this investigation; communications with others who have personal knowledge
7 of the events and circumstances described herein; and information gained through my
8 training and experience.

9 5. Because this Complaint is offered for the limited purpose of establishing
10 probable cause, I list only those facts that I believe are necessary to support such a
11 finding. I do not purport to list every fact known to me or others as a result of this
12 investigation.

13 6. This complaint and affidavit are being presented electronically pursuant to
14 Federal Criminal Procedure Rule 4.1 and 41(d)(3).

15 SUMMARY OF INVESTIGATION

16 7. This investigation arose from information provided to me by Customs and
17 Border Protection (CBP) Officers on September 21, 2019. During a routine outbound
18 inspection conducted by CBP officers the officers identified passenger WILLIAM
19 LEROY LENZ, traveling on a United States Passport. LENZ was scheduled to depart the
20 Seattle-Tacoma International Airport aboard Japan airlines flight # JL67 from Seattle,
21 Washington to Manila, Philippines via Narita, Japan.

22 8. Prior to the flight departing, CBP Officer Brian Jones performed system
23 queries which identified LENZ as a match with a previous felony conviction in King
24 County, Washington in 2011 for the possession and attempt to deal in depictions of a
25 minor. Due to LENZ's previous criminal history involving minor children, an electronic
26 media exam of any electronic media devices in LENZ's possession was requested by
27 CBP Officer Jones.
28

1 9. CBP Officers asked for LENZ's cellular device, an Apple I phone XS Max
2 (Model: MT5Y2LL/A, IMEI: 353093100407715, Serial: FFMYPD1N2KPHG), and HP
3 Elitebook laptop (Serial: BCALR103C9EBR0BDIR) which LENZ provided. LENZ
4 voluntarily provided all passcodes and usernames for his electronic devices.

5 10. During the examination, four photos of what appeared to be a naked
6 juvenile male were discovered in a password protected photo application titled
7 "Photovault". CBP Officer Hartman contacted me to notify of the discovery. CBP
8 Officer Jones continued the examination of the phone and discovered a chat conversation
9 inside an application titled "Telegram" on LENZ's phone. In the chat conversation,
10 LENZ stated he had committed sexual acts with children as young as three and a half
11 years old. In the chat LENZ also requested to receive photos of children with less clothes
12 on. CBP Officer Hartman continued the electronic media exam of LENZ's device and an
13 application titled "MEGA" was discovered. The "MEGA" application was password
14 protected and contained 63 video files in the "Offline" tab of the application. One of the
15 video files was opened and a video of a male masturbating over an infant and then later
16 placing his penis inside the infant's mouth was discovered. LENZ was held for further
17 investigation by HSI.

18 11. I arrived at the SeaTac International Airport at approximately 4:00 PM. I
19 was provided the cellular phone with conversations, images and videos by CBP. I read
20 the chats between LENZ and other yet unidentified individuals in which LENZ discussed
21 the sexual abuse of a child "3.5" years old. At this time, I saw the MEGA file containing
22 the videos of interest and quickly determined there was child pornography on the cellular
23 phone.

24 12. Multiple videos depicting child pornography were located within the
25 MEGA file on the cellular phone. Below are examples of two of these video files.

26 One video is a color video that depicts an adult male masturbating with his hand
27 over an infant. Based on the child's size and features, I could tell instantly that the
28 infant was under 24 months old. The adult male then puts his penis in the infant's
mouth and ejaculates into and onto the infant's mouth.

1 A second color video shows a mature male using his penis to penetrate the anus of
2 an infant male while the infant male is lying on his back with his legs spread wide
3 and in an upward position. Based on the child's size and features, I could tell
4 instantly that the infant was under 24 months old.

5 13. I read LENZ his Miranda rights of which he waived and chose to speak
6 with me and CBP Officer Hartman. LENZ admitted to the possession of the videos when
7 confronted by the images. LENZ explained he obtained the videos from individuals he
8 had met through online internet chatgroups, Scruff and Grinder, utilizing his cellular
9 phone. LENZ admitted to sending images back and forth using various video sharing file
10 programs and chat forums. LENZ admitted to chatting with these other individuals about
11 sex acts with children and animals but stated the conversations were only his fantasies.
12 However, it was during these chats when the file sharing would occur. LENZ stated the
13 files located in the MEGA folder were shared within approximately the last month.

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16 //

CONCLUSION

14. Based on the above facts, I believe that there is probable cause to conclude that WILLIAM LEROY LENZ committed the offense charged in this Complaint.

Steven J. Munson

STEVEN MUNSON, Special Agent
Department of Homeland Security
Homeland Security Investigations

The above-named agent provided a sworn statement attesting to the truth of the foregoing affidavit by telephone on September 22, 2019. Based on the Complaint and Affidavit sworn to me, the Court hereby finds that there is probable cause to believe the Defendant committed the offenses set forth in the Complaint.

DATED this 22nd day of September 2019.



BRIAN A. TSUCHIDA
United States Chief Magistrate Judge